

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
ALAN DWAYNE FRITZ	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
ALAN DWAYNE FRITZ	:	CASE NO. 1-24-bk-02554
Respondent	:	

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 18th day of December 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. § 1325(a)(3) in that it has not been proposed in good faith. The Plan should provide for:
 - a. All non-exempt proceeds from the sale of a valuable violin to be paid to unsecured creditors (and not just \$20,000.00 to be paid to the Trustee generally); and
 - b. A six (6) month deadline for the sale to complete.
2. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid.
 - b. The Plan proposes an unrealistic and speculative step payment, contrary to § 1325(a)(6).
 - c. The Debtor is unable to make payments under the Plan, contrary to §1325(a)(6). The Plan cannot be based on "estimated income".

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 18th day of December 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

GARY J. IMBLUM, ESQUIRE
4615 DERRY STREET
HARRISBURG, PA 17111-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee